

EXHIBIT C
(Proposed Notice)

Pamela M. Egan, WSBA No. 54736
POTOMAC LAW GROUP PLLC
1905 7th Avenue W.
Seattle, Washington 98119
Telephone: (415) 297-0132
Facsimile: (202) 318-7707
Email: pegan@potomacclaw.com
Attorneys for Mark D. Waldron, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 7

The Honorable Frederick P. Corbit
Chapter 7

**NOTICE OF MOTIONS AND
OPPORTUNITY TO OBJECT**

PLEASE TAKE NOTICE THAT Mark D. Waldron, in his official capacity as the Chapter 7 Trustee (the “Trustee”) in the above-captioned case, has filed the following motions: **(1)** *Chapter 7 Trustee’s Motion for Order Approving Settlement Agreement (RI Landlord)*, pursuant to which the Trustee seeks permission to settle the chapter 11 administrative claim of the Debtor’s former landlord in Rock Island, Washington in the amount of \$83,250 by agreeing to the allowance, but not payment, of the claim in the amount of \$65,400; **(2)** *Chapter 7 Trustee’s Motion (i) to Establish Case Notice Procedures and (ii) Approve Limited Notice Regarding Specific Motions*, pursuant to which the Trustee seeks to limit notice in this case to: (i) the United States Trustees Office; (ii) David Carlson, the Debtor’s director; (iii) Andrey Kuzenny, who signed the Debtor’s petition and schedules; (iv) holders of allowed Chapter 11 administrative claims; (v) holders of the ten largest trade claims; (vi) holders of the ten largest token and

Notice of Motions and
Opportunity to Object – Page 1

1 miner claims, and (vii) any party whose interests are directly affected by a specific
2 filing; **(3) Chapter 7 Trustee's Motion for Allowance of and Authority to Pay**
3 *Chapter 7 Administrative Expense Claim (Storage and Equipment)*, pursuant to
4 which the Trustee seeks the allowance of and the authority to pay the
5 administrative claim of (a) Insta-Stor, Inc. in the amount of \$270.50, for storage,
6 and (b) NCW Consultants, LLC in the amount of \$695.00, for record retention and
7 equipment removal; and **(4) Chapter 7 Trustee's Motion for Allowance, But Not**
8 *Payment, of Chapter 11 Administrative Expense Claim (Stretto)*, pursuant to
9 which the Trustee seeks the allowance of, but not authority to pay, the chapter 11
10 administrative claim of Business Management Solutions, Inc. d/b/a Stretto in the
11 amount of \$3,513.27. The foregoing four motions are referred to herein
12 collectively as the "Motions."

13 The Motions and their supporting papers, if any, are located on the Court's
14 docket and may be obtained from the Court clerk. **Any objection to the**
15 **Settlement must be served on undersigned counsel and filed with the Court**
16 **on or before March 15, 2021.** The Motions may be granted and the Court may
17 enter an Order without an actual hearing or further notice unless a written
18 objection is timely served and filed.

19 Dated: February 17, 2021 POTOMAC LAW GROUP PLLC

20 By: /s/ Pamela M. Egan
21 Pamela M. Egan (WSBA No. 54736)
22 *Attorneys for Mark D. Waldron, Chapter 7*
23 *Trustee*

24 Notice of Motions and
25 Opportunity to Object – Page 2